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December 13, 2019

By ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)
Request for Extension

Dear Judge Nathan:

On behalf of Ali Sadr, we respectfully request an extension of time to file motions in limine regarding the government's proposed expert witnesses. The motions in limine deadline is December 20, 2019. Dkt. No. 141. Sadr intends to file certain motions in limine by that deadline. However, yesterday the government disclosed for the first time three proposed expert witnesses. Sadr anticipates moving to exclude some of the proposed topics covered by the government's expert disclosures but would like more than one week to evaluate the government's notice and research these important issues. In light of the holidays, Sadr proposes filing any motion(s) to exclude expert testimony by January 10, 2020. The government consents to this request and proposes two weeks for its response (due January 24, 2020) and one week for any reply (due January 31, 2020), dates that are acceptable to Sadr. In accordance with the Court's Standing Order, Sadr provides the following summary:

Original due date: December 20, 2019.
Number of previous requests for adjournment or extension: 0.
Disposition of previous requests: Not applicable.
Consent: The government consents.
Date of next scheduled appearance: Feb. 10, 2020.

For the foregoing reasons, Sadr respectfully requests that the Court grant this extension and order the parties to follow his proposed schedule for the filing of motions to exclude expert testimony.

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Respectfully submitted,

/s/ Brian M. Heberlig

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cc: Counsel of Record (via ECF)